

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,
JULIO CESAR MEDEIROS NEVES, and all
those similarly situated,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617 WGY

**EXHIBITS TO BRIEFING ON INDIVIDUAL
APPLICATIONS FOR BAIL
THURSDAY, APRIL 23, 2020**

**EXHIBIT 11 - LETTER FROM WOMEN AT BRISTOL TO
JUDGE YOUNG**

To: Judge William G. Young
From: ICE female detainees at the Bristol County Sheriff's Office.

We are a group of detainees at the Bristol County Sheriff's Office. We are kept in inhumane conditions, in locked down several hours a day in a small cell. We also are being detained with state-inmates.

Before March, 2020, there were 38 people in the unit between detainees and state-inmates. Some of the state-inmates arrived very sick with multiple infections and detoxing from drugs abused. Some of them were very violent. The fact that we are in a constrained and controlled environment exposed to violent behaviors from state-inmates increase our anxieties and stress.

Sometimes, we do not have toilet paper, hand soap, sanitizer and cleaning supplies for days. They do not have any workable medical system to protect us from any type of viral infections such as the flu and the novel Covid-19. The alleged medical program is a chimera. The Sheriff neglects to order the adequate treatment when needed allegedly lacking of funds. For example, Miss. Bengu Blocked has multiples tumors through out the body, which have been worsening and worsening and abnormal menstrual cycle. No medical steps have been taken to properly and adequately diagnose and treat her.

Another detainee Angela De Jesus has been suffering gastrical problems for over a year without proper diagnose and treatment. Ms. Karina Rojas is suffering from Human Papilloma Virus, none treatment has been given to her.

At the same time Covid-19 impacted the United States and medical guide lines announced by Public Officials and the U.S President, Mr. Hudgson fail to take the necessary measure to protect detainees for example as many people were dying for Covid-19, Ms. Altagracia Boel was brought into the facility without being tested or quarantined for Covid-19 few days after, she was very sick. After many pleading she was admitted to the medical unit. She showed shortness of breath, vomiting, headache, dizziness and nausea. Instead of giving her proper medical treatment, she was secluded in an unsanitized cell for 3 days she was tested for Covid-19 and returned to the unit without the result.

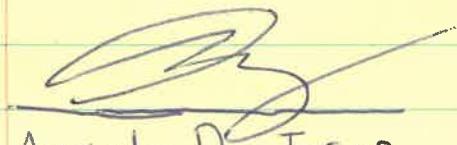
If we remain in custody, the future looks dark because there is no vaccine for Covid-19. More than half a million people in the U.S have been infected with Covid-19. The only thing that is stopping Mr. Hudgson's from crowding the unit, it is this honorable Court's order. We are very fearful of getting sick or dying from Covid-19. Mr. Hudgson's behaviour has been reckless because he did not take any safe measurement despite the fact of the national medical emergency until the instant class action was filed in this Court. There is nothing to stop Mr. Hudgson for bringing new infected inmates and detainees from the outside once this case is over.

Day by day, our anxieties are increasing not only for the dangerousness of being infected with Covid-19 due to the fact that we cannot keep social distance in a 30x30 (3feet) cell, but also we are very concern that we cannot support emotionally our U.S citizens families and friends in this pandemic.

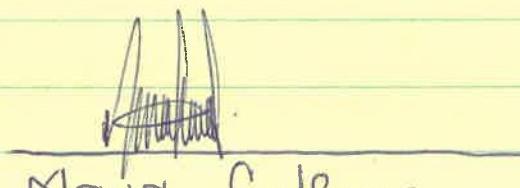
Please give us the opportunity to litigate our immigration cases from outside where can adhere to the CDC's medical guidelines, social distancing and safety, and with proper resources. Please do not leave us behind.

Thank you for your time and consideration in this matter.

Respectfully,

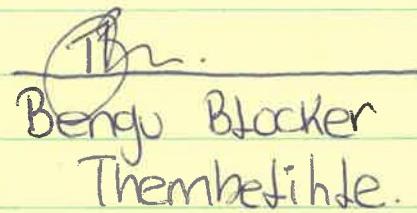


Angela De Jesus



Maria Gelimen
Savino.

Attagracia Baez
Attagracia Baez.



Bengu Blocker
Thembefihle.

Karina Rojas
Karina Rojas

Dated: April-21-20.

